

**Fill in this information to identify your case:**

United States Bankruptcy Court for the:

SOUTHERN DISTRICT OF TEXAS

Case number (if known)

Chapter

**11**☐ Check if this an amended filing

## Official Form 201

**Voluntary Petition for Non-Individuals Filing for Bankruptcy**

4/19

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1.	<b>Debtor's name</b>	RJL Entertainment, Inc.	
2.	<b>All other names debtor used in the last 8 years</b> <small>Include any assumed names, trade names and <i>doing business as</i> names</small>	DBA Club Cheetah	
3.	<b>Debtor's federal Employer Identification Number (EIN)</b>	27-0005330	
4.	<b>Debtor's address</b>	<b>Principal place of business</b>  <b>6425 South Padre Island Drive</b> <b>Corpus Christi, TX 78412</b> <small>Number, Street, City, State &amp; ZIP Code</small>  <b>Nueces</b> <small>County</small>	<b>Mailing address, if different from principal place of business</b>  <b>924 Leopard</b> <b>Corpus Christi, TX 78401</b> <small>P.O. Box, Number, Street, City, State &amp; ZIP Code</small>  <b>Location of principal assets, if different from principal place of business</b>  <small>Number, Street, City, State &amp; ZIP Code</small>
5.	<b>Debtor's website (URL)</b>		
6.	<b>Type of debtor</b> <input checked="" type="checkbox"/> Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)) <input type="checkbox"/> Partnership (excluding LLP) <input type="checkbox"/> Other. Specify:		

Debtor **RJL Entertainment, Inc.**  
Name

Case number (if known)

**7. Describe debtor's business****A. Check one:**

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
- ☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
- ☐ Railroad (as defined in 11 U.S.C. § 101(44))
- ☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
- ☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
- ☒ None of the above

**B. Check all that apply**

- ☐ Tax-exempt entity (as described in 26 U.S.C. §501)
- ☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. §80a-3)
- ☐ Investment advisor (as defined in 15 U.S.C. §80b-2(a)(11))

**C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor.**  
See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

**8. Under which chapter of the Bankruptcy Code is the debtor filing?****Check one:**

- ☐ Chapter 7
- ☐ Chapter 9

☒ Chapter 11. **Check all that apply:**

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$2,725,625 (amount subject to adjustment on 4/01/22 and every 3 years after that).
- ☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
- ☐ A plan is being filed with this petition.
- ☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
- ☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
- ☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**☒ No.☐ Yes.

If more than 2 cases, attach a separate list.

District	_____	When	_____	Case number	_____
District	_____	When	_____	Case number	_____

**10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?**☒ No☐ Yes.

List all cases. If more than 1, attach a separate list

Debtor	_____	Relationship	_____
District	_____	When	_____
		Case number, if known	_____

Debtor **RJL Entertainment, Inc.**  
Name

Case number (if known)

**11. Why is the case filed in this district?***Check all that apply:*

- ☒ Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.
- ☐ A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

**12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?**☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (*Check all that apply.*)☐ It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? \_\_\_\_\_

☐ It needs to be physically secured or protected from the weather.☐ It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).☐ Other \_\_\_\_\_**Where is the property?** \_\_\_\_\_

Number, Street, City, State &amp; ZIP Code

**Is the property insured?**☐ No☐ Yes. Insurance agency \_\_\_\_\_

Contact name \_\_\_\_\_

Phone \_\_\_\_\_

**Statistical and administrative information****13. Debtor's estimation of available funds***Check one:*

- ☒ Funds will be available for distribution to unsecured creditors.
- ☐ After any administrative expenses are paid, no funds will be available to unsecured creditors.

**14. Estimated number of creditors**☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000**15. Estimated Assets**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion**16. Estimated liabilities**☐ \$0 - \$50,000☐ \$50,001 - \$100,000☐ \$100,001 - \$500,000☐ \$500,001 - \$1 million☒ \$1,000,001 - \$10 million☐ \$10,000,001 - \$50 million☐ \$50,000,001 - \$100 million☐ \$100,000,001 - \$500 million☐ \$500,000,001 - \$1 billion☐ \$1,000,000,001 - \$10 billion☐ \$10,000,000,001 - \$50 billion☐ More than \$50 billion

Debtor **RJL Entertainment, Inc.**  
Name

Case number (if known)

**Request for Relief, Declaration, and Signatures****WARNING** -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**17. Declaration and signature  
of authorized  
representative of debtor**

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **June 10, 2019**  
MM / DD / YYYY**X /s/ Richard A. Conlon**  
Signature of authorized representative of debtor  
  
Title **President****Richard A. Conlon**  
Printed name**18. Signature of attorney****X /s/ Nathaniel Peter Holzer**  
Signature of attorney for debtorDate **June 10, 2019**  
MM / DD / YYYY**Nathaniel Peter Holzer**  
Printed name**Jordan, Holzer & Ortiz, P.C.**  
Firm name**500 North Shoreline Blvd.  
Suite 900  
Corpus Christi, TX 78401**  
Number, Street, City, State & ZIP CodeContact phone **361.884.5678** Email address **pholzer@jhwclaw.com****00793971 TX**  
Bar number and State

**CORPORATE RESOLUTION OF  
RJL ENTERTAINMENT, INC.**

Joint meetings of the directors and shareholders of RJL ENTERTAINMENT, INC., a Texas corporation (the "**Company**"), was held on the 10<sup>th</sup> day of June, 2019, and notice being waived by all directors and shareholders, and motion duly made; it was hereby


RESOLVED that the Company, acting through Richard Conlon, shall immediately file or cause to be filed, a Voluntary Petition in Bankruptcy (Chapter 11) with the appropriate Court pursuant to the United States Bankruptcy Code, 11 U.S.C. § 101 *et seq.*; and it was further

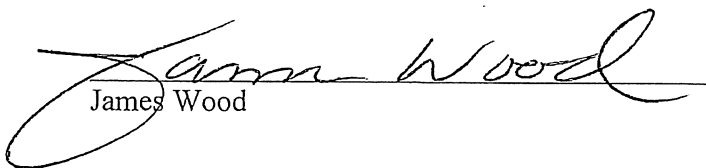
RESOLVED that Richard Conlon is authorized to retain Jordan, Holzer & Ortiz, P.C. as legal counsel and other consultants, experts, professionals, and advisors as the need may arise in order to commence and continue said Bankruptcy proceeding; to execute all documents, enter into any agreements, open bank accounts, make available all records, and to do all other acts which may be necessary to commence and continue said Bankruptcy proceeding on behalf of the Company; and it was further

RESOLVED that Richard Conlon shall have authority to sign any and all pleadings or other documents in connection with its Chapter 11 proceeding and that Richard Conlon shall be the designated corporate officer to act on behalf of the Company in said proceeding.

The undersigned being all the shareholders and directors of the Company.

Dated this 10<sup>th</sup> day of June, 2019.

  
Richard Conlon

  
James Wood

**Fill in this information to identify the case:**Debtor name **RJL Entertainment, Inc.**United States Bankruptcy Court for the: SOUTHERN DISTRICT OF TEXAS

Case number (if known) \_\_\_\_\_

☐ Check if this is an amended filingOfficial Form 202**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

**WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.**

**Declaration and signature**

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets—Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☐ Other document that requires a declaration \_\_\_\_\_

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **June 10, 2019****X /s/ Richard A. Conlon**

Signature of individual signing on behalf of debtor

**Richard A. Conlon**

Printed name

**President**

Position or relationship to debtor

**Fill in this information to identify the case:**

Debtor name **RJL Entertainment, Inc.**  
 United States Bankruptcy Court for the: **SOUTHERN DISTRICT OF TEXAS**  
 Case number (if known): \_\_\_\_\_

☐ Check if this is an  
 amended filing

**Official Form 204**
**Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders**

12/15

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an insider, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address, including zip code	Name, telephone number and email address of creditor contact	Nature of claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
				Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
Beck Family, Ltd. 132 Alexandria La Vernia, TX 78121	Richard Beck  361.960.4843					\$73,000.00
Chaves, Douglas Chaves, Obregon & Perales 802 N. Carancahua, Ste. 1200 Corpus Christi, TX 78401	Douglas Chaves  dchaves@coplawfirm.com 361.884.5400	Attorney's fees				\$775.00
McKibben, Martinez, Jarvis & Wood, LLP Attn: Lane K. Jarvis, Jr. 555 N. Carancahua, Ste. 1100 Corpus Christi, TX 78401-0841	Lane Jarvis  ljarvis@mcv-law.com 361.882.661	Attorney's fees				\$29,211.51
Pro Audio Video Solutions 4833 Saratoga Blvd., #262 Corpus Christi, TX 78413		Goods and/or Services				\$5,000.00
South Texas Universal Svc 3137 Boar Thicket Dr. Corpus Christi, TX 78414		Goods and/or Services				\$10,000.00
Texas Comptroller of Public Accounts Revenue Accounting/Bankruptcy Section P.O. Box 13528 Austin, TX 78711	Aurora Vasquez  361.882.1234 ext. 40835	Taxes	Contingent Unliquidated Disputed Subject to Setoff			\$3,000,000.00

**United States Bankruptcy Court  
Southern District of Texas**

In re **RJL Entertainment, Inc.**

Debtor(s)

Case No.  
Chapter**11**

**LIST OF EQUITY SECURITY HOLDERS**

Following is the list of the Debtor's equity security holders which is prepared in accordance with rule 1007(a)(3) for filing in this Chapter 11 Case

Name and last known address or place of business of holder	Security Class	Number of Securities	Kind of Interest
<b>Conlon, Richard</b>		<b>50%</b>	<b>Ownership</b>
<b>Wood, James</b>		<b>50%</b>	<b>Ownership</b>

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the **President** of the corporation named as the debtor in this case, declare under penalty of perjury that I have read the foregoing List of Equity Security Holders and that it is true and correct to the best of my information and belief.

Date **June 10, 2019**

Signature **/s/ Richard A. Conlon**  
**Richard A. Conlon**

*Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both.  
18 U.S.C. §§ 152 and 3571.*



**United States Bankruptcy Court  
Southern District of Texas**

In re **RJL Entertainment, Inc.**

Debtor(s)

Case No.

Chapter

**11**

**VERIFICATION OF CREDITOR MATRIX**

I, the President of the corporation named as the debtor in this case, hereby verify that the attached list of creditors is true and correct to the best of my knowledge.

Date: **June 10, 2019**

**/s/ Richard A. Conlon**

**Richard A. Conlon/President**

Signer/Title

American Bank  
P.O Box 6469  
Corpus Christi, TX 78466-6469

Beck Family, Ltd.  
132 Alexandria  
La Vernia, TX 78121

Chaves, Douglas  
Chaves, Obregon & Perales  
802 N. Carancahua, Ste. 1200  
Corpus Christi, TX 78401

Ganoe, Daniel, next friend of M.G. minor  
Rep of Estate of L. Reynolds  
c/o Thomas J. Henry  
521 Starr Street  
Corpus Christi, TX 78401

Ganoe, Daniel, next friend of M.G. minor  
Rep of Estate of L. Reynolds  
c/o Tate Sanders  
521 Starr Street  
Corpus Christi, TX 78401

Ganoe, Daniel, next friend of M.G. minor  
Rep of Estate of L. Reynolds  
c/o Nicole D. Meyer  
521 Starr Street  
Corpus Christi, TX 78401

Ganoe, Daniel, next friend of M.G. minor  
Rep of Estate of L. Reynolds  
c/o John D. Schroeder  
521 Starr Street  
Corpus Christi, TX 78401

Ganoe, Daniel, next friend of M.G. minor  
Rep of Estate of L. Reynolds  
c/o Chirag N. Desai  
521 Starr Street  
Corpus Christi, TX 78401

Green, Kenneth  
c/o Ira Z. Miller  
545 N. Upper Broadway, Ste. 114  
Corpus Christi, TX 78401

Herrman & Herrman  
Neely E. Balko  
1201 Third Street  
Corpus Christi, TX 78404

Internal Revenue Service  
Centralized Insolvency Operations  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Lazarte, Frank  
924 Leopard Street  
Corpus Christi, TX 78401

Martinez, Arnold, Invidually A/N/F  
Tiffany Martinez & Drew Martinez  
c/o Sassin Law Firm  
18170 Dallas Parkway, Ste. 501  
Dallas, TX 75287

McKibben, Martinez, Jarvis & Wood, LLP  
Attn: Lane K. Jarvis, Jr.  
555 N. Carancahua, Ste. 1100  
Corpus Christi, TX 78401-0841

Pro Audio Video Solutions  
4833 Saratoga Blvd., #262  
Corpus Christi, TX 78413

South Texas Universal Svc  
3137 Boar Thicket Dr.  
Corpus Christi, TX 78414

Texas Comptroller of Public Accounts  
Revenue Accounting/Bankruptcy Section  
P.O. Box 13528  
Austin, TX 78711

Texas Workforce Commission  
Bankruptcy Unit, Room 556  
101 E. 15th Street  
Austin, TX 78778-0001

Trujillo, Osmel & Montes, Geovany  
c/o Thomas J. Henry  
Leslie V. Rodriguez  
521 Starr Street  
Corpus Christi, TX 78401

Vinson, Justin  
c/o Rich Fancher & Jacqueline Franklin  
Baker & Fancher, LLP  
555 N. Carancahua, , Ste. 1200  
Corpus Christi, TX 78401

Ward, Gene  
Cotton, Schmidt LP  
P.O. Box 780  
Corpus Christi, TX 78403-0780

Exhibit B-2 to Appendix 5005: If filing "bare-bones" petition, matrix, &amp; 20 largest unsecured list.

**United States Bankruptcy Court**  
**Southern District of Texas**

In re RJL Entertainment, Inc.

Debtor(s)

Case No.

Chapter

11

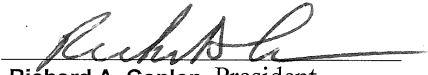
**DECLARATION FOR ELECTRONIC FILING OF  
BANKRUPTCY PETITION AND MASTER MAILING LIST (MATRIX)**

**PART I: DECLARATION OF PETITIONER:**

As an individual debtor in this case, or as the individual authorized to act on behalf of the corporation, partnership, or limited liability company seeking bankruptcy relief in this case, I hereby request relief as, or on behalf of, the debtor in accordance with the chapter of title 11, United States Code, specified in the petition to be filed electronically in this case. I have read the information provided in the petition and in the lists of creditors to be filed electronically in this case and ***I hereby declare under penalty of perjury*** that the information provided therein, as well as the social security information disclosed in this document, is true and correct. I understand that this Declaration is to be filed with the Bankruptcy Court within five (5) business days after the petition and lists of creditors have been filed electronically. I understand that a failure to file the signed original of this Declaration will result in the dismissal of my case.

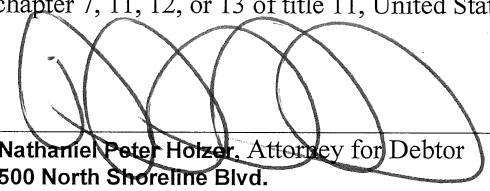
- I hereby further declare under penalty of perjury that I have been authorized to file the petition and lists of creditors on behalf of the debtor in this case.

Date:

6/10/19
  
 Richard A. Conlon, President
**PART II: DECLARATION OF ATTORNEY:**

I declare ***under penalty of perjury*** that: (1) I will give the debtor(s) a copy of all documents referenced by Part I herein which are filed with the United States Bankruptcy Court; and (2) I have informed the debtor(s), if an individual with primarily consumer debts, that he or she may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter.

Date:

6-10-19
  
 Nathaniel Peter Holzer, Attorney for Debtor  
 500 North Shoreline Blvd.  
 Suite 900  
 Corpus Christi, TX 78401  
 361.884.5678 Fax: 361.888.5555